

Nathan A. Schacht, Montana Bar No. 46224074

**BAKER & HOSTETLER LLP**

1801 California St., Suite 4400

Denver, CO 80202

Telephone: (303) 861-0600

Email: [nschacht@bakerlaw.com](mailto:nschacht@bakerlaw.com)

Jeffrey R. Baxter (*Admitted Pro Hac Vice*)

**BAKER & HOSTETLER, LLP**

1170 Peachtree Street, Suite 2400

Atlanta, GA 30309-7676

Telephone: 404.459.0050

Email: [jbaxter@bakerlaw.com](mailto:jbaxter@bakerlaw.com)

Jaqueline T. Menk (*Admitted Pro Hac Vice*)

**BAKER & HOSTETLER, LLP**

1170 Peachtree Street, Suite 2400

Atlanta, GA 30309-7676

Telephone: 404.459.0050

Email: [jmenk@bakerlaw.com](mailto:jmenk@bakerlaw.com)

*ATTORNEYS FOR DEFENDANT TRINITY HEALTHSHARE, INC.*

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION**

MARIA MOELLER and RON  
MOELLER,

Plaintiffs,

v.

THE ALIERA COMPANIES, INC.;  
TRINITY HEALTHSHARE;  
TIMOTHY MOSES; SHELLEY  
STELLE, CHASE MOSES and DOES  
1-10,

Defendants.

CASE NO.: 20-CV-00022-SEH

**DEFENDANT TRINITY  
HEALTHSHARE, INC.'S  
SUGGESTION OF BANKRUPTCY**

Defendant Trinity Healthshare, Inc. *d/b/a* Sharity Ministries, Inc. (“Trinity”),  
by and through its undersigned counsel, states as follows:

1. Trinity has filed a petition for relief under Title 11, United States Code, in the United States Bankruptcy Court for the District of Delaware, which bears the case number 21-11001.

2. Relief was ordered on July 8, 2021.

3. This action is founded on a claim from which a discharge would be a release or that seeks to impose a charge on the property of the estate.

WHEREFORE, Trinity suggests that this action against Trinity has been stayed by the operation of 11 U.S.C. § 362.

Dated this 9th day of July 2021.

**BAKER HOSTETLER, LLP**

/s/ Nathan A. Schacht

Nathan A. Schacht, Esq.  
1801 California Street, Suite 4400  
Denver, CO 80202-2662  
(303) 764-4029  
(303) 861-7805 - facsimile  
[nschacht@bakerlaw.com](mailto:nschacht@bakerlaw.com)

Jeffrey R. Baxter (*Admitted Pro Hac Vice*)  
1170 Peachtree Street, Suite 2400  
Atlanta, GA 30309-7676  
Telephone: 404.459.0050  
Email: [jbaxter@bakerlaw.com](mailto:jbaxter@bakerlaw.com)

Jaqueline T. Menk (*Admitted Pro Hac Vice*)  
1170 Peachtree Street, Suite 2400  
Atlanta, GA 30309-7676  
Telephone: 404.459.0050  
Email: [jmenk@bakerlaw.com](mailto:jmenk@bakerlaw.com)  
*Attorney for Trinity Healthshare, Inc.*

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a true and correct copy of the foregoing **DEFENDANT TRINITY HEALTHSHARE, INC.'S SUGGESTION OF BANKRUPTCY** to the following and all counsel of record via the court's EM/ECF system on July 9, 2021:

John M. Morrison  
MORRISON SHERWOOD WILSON DEOLA, PLLP  
401 North Last Chance Gulch  
P.O. Box 557  
Helena, Montana 59624-0557  
Email: [john@mswdlaw.com](mailto:john@mswdlaw.com)

Stefan T. Wall  
WALL, McLEAN & GALLAGHER, PLLC  
40 West Lawrence, Suite B  
PO Box 1713  
Helena, MT 59624  
Email: [stefan@mlfpllc.com](mailto:stefan@mlfpllc.com)

Elizabeth B. Shirley BURR & FORMAN 420 North 20th Street, Suite 3400 Birmingham, AL 35203 Email: <a href="mailto:bshirley@burr.com">bshirley@burr.com</a>	Sarah R. Craig BURR & FORMAN - TAMPA 201 North Franklin Street, Suite 3200 Tampa, FL 33602 Email: <a href="mailto:scraig@burr.com">scraig@burr.com</a>
---	--

Nathan Bilyeu  
Sean Slinger  
Jackson Murdo & Grant, P.C.  
203 North Ewing  
Helena, MT 59601

/s/ Nathan A. Schacht  
Nathan A. Schacht, Esq.